UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY,

Plaintiff,

v.

MICROSOFT CORPORATION, OPENAI, INC., OPENAI LP, OPENAI GP, LLC, OPENAI, LLC, OPENAI OPCO LLC, OPENAI GLOBAL LLC, OAI CORPORATION, LLC, OPENAI HOLDINGS, LLC,

Defendants.

Case No. 1:23-cv-11195-SHS

[PROPOSED] ORDER GRANTING MOTION TO ADMIT COUNSEL PRO HAC VICE

The motion of Andrew M. Gass for admission to practice *pro hac vice* in the above-captioned matter is granted.

Applicant has declared that he is a member in good standing of the bar of the State of California; and that his contact information is as follows:

Applicant's Name: Andrew M. Gass

Firm Name: Latham & Watkins LLP

Address: 505 Montgomery Street, Suite 2000

City/State/Zip: San Francisco, CA 94111

Telephone: (415) 391-0600

Fax: (415) 395-8095

Applicant having requested admission *pro hac vice* to appear for all purposes as counsel for Defendants OpenAI, Inc., OpenAI LP, OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo, LLC, OpenAI Global, LLC, OAI Corporation, LLC, OpenAI Holdings, LLC, (together, "OpenAI"), in the above-entitled action;

IT IS HEREBY ORDERED that Applicant is admitted to practice pro hac vice in the

above-captioned matter in the l	United States D	istrict Court for the S	outhern District of Ne	w York.
All attorneys appearing before	this Court are	subject to the Local	Rules of this Court, in	ncluding
the Rules governing discipline	of attorneys.			
Dated:	, 2024			
		United States Distric	et Judge Sidney H. Ste	